

From: Rand Crafts
To: mradulov@deq.state.ut.us
Date: Wednesday, August 22, 2001 7:47:51 PM
Subject: IPSC Draft AO - Corrections

Milka,

Hope your trip went well. Thank you for allowing us to comment early. Per our discussion on Friday morning, I am providing further input.

Regarding the terms in Condition 16, I understand the language for the fuel oil use was directly from the Title V permit. It just appears to be a big change from being a general description of the equipment (which I understand the State would use to determine equivalency) to being a condition in the AO. However, I think we would be OK with the addition of the words "maintenance" and "performance" to cover our needs as a condition of permitting, as we discussed.

Also, regarding used oil in Condition 16, I would like to suggest that to cover the intent of the used oil rules, without impacting our operating flexibility, that the language for this condition be changed to read "The owner/operator may fuel-blend self-generated used oil with coal at the active coal pile reclaim structure providing that self-generated used oil has not been mixed with hazardous waste." This statement fulfills the need at 40 CFR 279 to ensure used oil is properly managed and recycled. The specifications the DAQ is referring to are the "presumptive" limits. That is, if the constituents listed are below the thresholds (on-specification used oil), then the EPA presumes that the used oil has not been mixed with hazardous waste. However, if the constituents are above the thresholds (off-specification used oil), then IPSC must show that the used oil has not been mixed with hazardous waste. If this is shown, then used oil is still used oil and can be recycled normally, including energy recovery. Some virgin oils are purchased with these constituents already above the thresholds (to modify lubricating characteristics), so limiting our ability to further recycle them when used can be a significant impact (loss of energy, costs of disposal, segregation expenses, etc.). As you might tell, this is a big issue for us. So, again, if the DAQ maintains that IPSC can only burn on-specification used oil, we would like the regulatory authority explained that allows the DAQ to unilaterally and arbitrarily add a condition not ever before imposed on us.

In Condition 1., the correct fax number is 435-864-6670.

Finally, if you make the correction we discussed in Condition 9 regarding 30DRA for SO₂, I think we're set.

If you have further comments or questions, feel free to let me have it. Thanks.

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